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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

TAYLOR GOINES, Individually and on Behalf  
of Itself and All Others Similarly Situated,

Plaintiff,

v.

CELSIUS NETWORK, LLC, CELSIUS  
LENDING, LLC, CELSIUS KEYFI LLC,  
ALEXANDER MASHINSKY, SHLOMI  
“DANIEL” LEON, DAVID BARSE, and ALAN  
JEFFREY CARR,

Defendants.

Case No. 2:22-cv-04560

**DECLARATION OF JOHN RADICE**

I, JOHN RADICE, hereby declare as follows:

1. I am an principal with The Radice Law Firm, counsel for lead plaintiff Movants Zack Kaplan, Eli Kaplan, Ben Kaplan, Michael Kaplan, and Michael Mazzotta (“Celsius Investor Movants”) in the above-captioned action. I submit this Declaration in support of Celsius Investor Movants’ motion to appoint the Celsius Investor Movants to serve as lead plaintiff on behalf of the Class, and to approve Celsius Investor Movants’ selection of counsel.

2. I have attached hereto true and correct copies of the following exhibits:

Exhibit A: Press release published July 15, 2022, on Business Wire announcing the pendency of the lawsuit commenced by Taylor Goines against defendants herein.

Exhibit B: Certifications of Celsius Investor Movants.

Exhibit C: Movant’s Joint Declaration.

Exhibit D: Firm résumé of Scott+Scott Attorneys at Law LLP.

Exhibit E: Firm résumé of Radice Law Firm.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 13, 2022

s/ John Radice

John Radice

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on September 13, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

DATED: September 13, 2022

s/ John Radice  
JOHN RADICE (Bar No. 023612004)